

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.)	
)	
Plaintiff)	
v.)	Case No. PJM 08 cv 0921
)	
WORLD AVENUE USA, LLC, et al.)	
)	
Defendants)	
_____)	

**DEFENDANT WORLD AVENUE USA, LLC'S APPLICATION AS TO AMOUNT OF
ATTORNEYS' FEES**

Pursuant to this Court's Order at DE 606 dated February 16, 2011 that sanctioned Plaintiff BEYOND SYSTEMS, INC. ("BSI"), Defendant WORLD AVENUE USA, LLC ("WAUSA"), hereby submits its Application As to Amount of Attorneys' Fees awarded by this Court.

On October 21, 2010, Plaintiff BSI filed its Motion for Reconsideration of Discovery Order at DE 441 Regarding Plaintiff's Responses to Defendant WAUSA's Fourth Set of Document Requests ("Motion for Reconsideration"). *See* DE 455. On November 8, 2010, Defendant WAUSA filed its Memorandum of Law in Opposition to Plaintiff BSI's Motion for Reconsideration. *See* DE 495 ("Memorandum of Law"). On December 14, 2010, Plaintiff BSI filed its Reply in Support of Opposition to Defendant WAUSA's Motion to Compel [sic] As To Plaintiff's Responses to WAUSA's Fourth Set of Document Requests ("Reply"). *See* DE 567. At hearing on February 16, 2011, the Court denied the Motion for Reconsideration and awarded sanctions. *See* DE 606.

Greenberg Traurig, P.A., maintains contemporaneous time records for attorneys' fees on a particular matter. Those time records show that \$10,874 was incurred in connection with BSI's

Motion for Reconsideration, WAUSA's Memorandum of Law, BSI's Reply, and preparation for the February 16, 2011 hearing. The attorneys' fees and costs are detailed in the Declarations of Sanford M. Saunders, Jr. and John L. McManus. *See* Exhibits 4-5 to Memorandum of Law.

WHEREFORE, Defendant WORLD AVENUE USA, LLC respectfully requests entry of judgment against Plaintiff BEYOND SYSTEMS, INC. in the amount of \$10,874, plus statutory interest, and for such other and further relief as this Court deems just and appropriate.

Dated: March 2, 2011

Respectfully submitted,
Attorneys for World Avenue USA, LLC

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